

1 PHILLIP A. TALBERT  
Acting United States Attorney  
2 JOSEPH D. BARTON  
MELANIE L. ALSWORTH  
3 Assistant United States Attorneys  
2500 Tulare Street, Suite 4401  
4 Fresno, CA 93721  
Telephone: (559) 497-4000  
5 Facsimile: (559) 497-4099

6 Attorneys for Plaintiff  
7 United States of America

8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 DARYOL RICHMOND, aka "Nutcuse,"  
"Nuttcase," and "Nuttcase 3x,"  
15 TELVIN BREAUX, aka "AJ" and "Lilcup,"  
and  
16 HOLLY WHITE,

17 Defendants.  
18

CASE NO. 1:21-CR-00184-DAD-BAM

**STIPULATION BETWEEN THE PARTIES  
REGARDING PROTECTED INFORMATION**

19 WHEREAS, the discovery in this case contains a large amount of personal information including  
20 Social Security numbers, personal identification numbers, dates of birth, financial account numbers,  
21 telephone numbers, and residential addresses ("Protected Information"); and

22 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the  
23 unauthorized disclosure or dissemination of this information to anyone not a party to the court  
24 proceedings in this matter;

25 The parties agree that entry of a stipulated protective order is appropriate.

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1        THEREFORE, defendant TELVIN BREAUX, by and through his counsel of record (“Defense  
2 Counsel”), and plaintiff the UNITED STATES, by and through its counsel of record, hereby agree and  
3 stipulate as follows:

4        1.        This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of  
5 Criminal Procedure and its general supervisory authority;

6        2.        This Order pertains to all discovery provided to or made available to Defense Counsel as  
7 part of discovery in this case (hereafter, collectively known as “the discovery”);

8        3.        By signing this Stipulation, Defense Counsel agrees not to share any documents that  
9 contain Protected Information with anyone other than Defense Counsel and designated defense  
10 investigators and support staff. Defense Counsel may permit the defendant to view unredacted  
11 documents in the presence of his attorney, defense investigators, and support staff. The parties agree  
12 that Defense Counsel, defense investigators, and support staff shall not allow the defendant to copy  
13 Protected Information contained in the discovery. The parties agree that Defense Counsel, defense  
14 investigators, and support staff may provide the defendant with copies of documents from which  
15 Protected Information has been redacted;

16        4.        The discovery and information therein may be used only in connection with the litigation  
17 of this case including exhaustion of direct and collateral appellate proceedings and for no other purpose.  
18 The discovery is now and will forever remain the property of the Government. Defense Counsel will  
19 return the discovery to the Government or certify that it has been destroyed at the conclusion of the case  
20 including exhaustion of direct and collateral appellate proceedings;

21        5.        Defense Counsel will store the discovery in a secure place and will use reasonable care to  
22 ensure that it is not disclosed to third persons in violation of this agreement;

23        6.        Defense Counsel shall be responsible for advising the defendant, as well as Defense  
24 Counsel’s employees, other members of the defense team, and defense witnesses, of the contents of this  
25 Stipulation and Order; and

26        7.        In the event that the defendant substitutes counsel, undersigned Defense Counsel agrees  
27 to withhold discovery from any new counsel unless and until substituted counsel agrees also to be bound  
28 by this Stipulation and Order.

1 IT IS SO STIPULATED.

2  
3 DATED: August 3, 2021

4  
5 /s/ Alekxia Torres Stallings  
6 ALEKXIA TORRES STALLINGS  
7 COUNSEL FOR TELVIN BREAUX

8  
9 /s/ Joseph Barton  
10 JOSEPH BARTON  
11 COUNSEL FOR UNITED STATES  
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Plaintiff,

v.

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TELVIN BREAUX, aka "AJ" and "Lilcup,"  
and  
HOLLY WHITE,

Defendants.

CASE NO. 1:21-CR-00184-DAD-BAM

**PROTECTIVE ORDER BETWEEN THE  
PARTIES REGARDING PROTECTED  
INFORMATION**

ORDER

For good cause shown, the stipulation between counsel dated August 3, 2021, in Case No. 1:21-cr-00184-DAD-BAM, regarding discovery and treatment of Protected Information is approved.

IT IS SO ORDERED.

Dated: August 3, 2021

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE